

DISTRICT OF MINNESOTA
District Court File No. 18-CR-150 (1) (DWF/HB)

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	GOVERNMENT’S MOTION
)	FOR AN EVIDENTIARY
v.)	HEARING PURSUANT TO
)	LOCAL RULE 83.10(f)
(1) MICHAEL HARI,)	
)	
Defendant.)	

The United States of America, through its attorneys, W. Anders Folk, Acting United States Attorney for the District of Minnesota and Assistant United States Attorneys Allison K. Ethen and Timothy C. Rank, hereby moves for an evidentiary hearing pursuant to Local Rule 83.10(f)(1).

The Defendant has objected to the PSR’s application of the Obstruction enhancement under U.S.S.G. § 3C1.1. Accordingly, the government seeks an evidentiary hearing pursuant to Local Rule 82.10(f)(1) to present testimony at the sentencing hearing regarding the Defendant’s attempted escape from custody in this matter, in support of the application of the Obstruction enhancement. The government anticipates that the testimony should take no more than 30 minutes.

Dated: August 30, 2021

Respectfully Submitted,

W. ANDERS FOLK
Acting United States Attorney

s/ Allison K Ethen

BY: ALLISON K. ETHEN
TIMOTHY C. RANK
Assistant United States Attorneys